



April 12, 2024

Honorable Brett H. Ludwig  
U.S. District Court for the Eastern District of Wisconsin  
517 East Wisconsin Avenue  
Milwaukee, WI 53202

Re: Lee, Jr., Michael A. v. Ambasan, Gina  
Case No. 2:22-CV-00930

Dear Judge Ludwig:

We are responding concerning the progress of discovery in this matter. There was an exchange of discovery requests in February. The parties agree to mediate the matter to hopefully avoid expensive discovery. The mediation happened in March but did not settle the case. Thereafter, discussions happened to schedule depositions. We agreed to produce our client for a zoom deposition at 3:30 on April 29<sup>th</sup>. We were told that was unacceptable because the questioning would take 7 hours to complete. We felt such a long deposition needed to be in person. The parties agreed to a deposition here on April 29<sup>th</sup> (enclosed April 4<sup>th</sup> email from Ms. Motley) which I confirmed on April 5<sup>th</sup>. (enclosed email). Ms. Motley then filed the motion on the 5<sup>th</sup>. We got it on the 8<sup>th</sup>. The Court entered an order on the 10<sup>th</sup> while I was on vacation. I apologize to the Court for the delay. We will follow the Court's order.

Very truly yours,

DEVINE HAHN, S.C.

- Thomas M. Devine  
*tdevine@devinehahn.com*

TMD/dlr  
Enc.

cc: Kimberly Motley, Motley Legal  
Gina Amasan

## Darcy Redding

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**From:** kmotley motleylegal.com <kmotley@motleylegal.com>  
**Sent:** Thursday, April 04, 2024 5:06 PM  
**To:** Thomas M. Devine  
**Cc:** Darcy Redding  
**Subject:** Re: Subpoenas to DOC

No worries. We can conduct the depositions in Milwaukee which actually works better.

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**From:** Thomas M. Devine <tdevine@devinehahn.com>  
**Sent:** Thursday, April 4, 2024 4:59 PM  
**To:** kmotley motleylegal.com <kmotley@motleylegal.com>  
**Cc:** Darcy Redding <dredding@devinehahn.com>  
**Subject:** RE: Subpoenas to DOC

My client can make the 29<sup>th</sup> at 9. I can make this depo but the notice is to conduct the deposition remotely. You need a stipulation under Rule 30(4) and Rule 29. I have not agreed to remote depositions.

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**From:** kmotley motleylegal.com [mailto:[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)]  
**Sent:** Thursday, April 04, 2024 3:15 PM  
**To:** Thomas M. Devine <tdevine@devinehahn.com>  
**Subject:** Re: Subpoenas to DOC

Hello Atty. Devine,

I have not heard anything with regards to my emails of April 1<sup>st</sup> regarding depos for third parties. Additionally, I have also heard nothing back regarding deposing your client on April 29<sup>th</sup> at 9am.

I will assume that all the dates are fine and plan to continue to set on a few more depos. If I hear nothing back by 4pm on April 5<sup>th</sup> I assume all of the previously scheduled depo dates are fine.

Regards,  
Kim

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**From:** kmotley motleylegal.com <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>  
**Sent:** Monday, April 1, 2024 5:04 PM  
**To:** Thomas M. Devine <[tdevine@devinehahn.com](mailto:tdevine@devinehahn.com)>  
**Subject:** Subpoenas to DOC

Attached are subpoenas we sent to DOC.

We have tentatively scheduled Latasha Lott for her depo on April 30 at 9am which may change depending on her availability.

--  
Best,

Kim

Kimberley Cy Motley, Esq.  
C.E.O. / Founding Partner  
Motley Legal Services  
Afghan Mobile : 93 (0) 788 887 887  
Intl. Number : 1 (704) 765 - 4887  
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## Darcy Redding

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**From:** Thomas M. Devine  
**Sent:** Friday, April 05, 2024 2:40 PM  
**To:** kmotley motleylegal.com  
**Cc:** Darcy Redding  
**Subject:** RE: Subpoenas to DOC

I believe we have agreed that my client will not be remote. The deposition can take place at my office.  
Other depos depend on the circumstances

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**From:** kmotley motleylegal.com [mailto:[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)]  
**Sent:** Thursday, April 04, 2024 5:24 PM  
**To:** Thomas M. Devine <[tdevine@devinehahn.com](mailto:tdevine@devinehahn.com)>  
**Cc:** Darcy Redding <[dredding@devinehahn.com](mailto:dredding@devinehahn.com)>  
**Subject:** Re: Subpoenas to DOC

Hello Attorney Devine,

I just want to make clear that you are not approving remote depositions in this matter. If I am mistaken, please clarify if you

- 1) will stipulate for remote depositions of your client, AND
- 2) if you will stipulate for remote depositions for 3<sup>rd</sup> parties.

I look forward to receiving your answer by 2:00p.m. tomorrow April 5, 2024. Thank you in advance.

Warm regards,  
Kim

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Kim

Kimberley Cy Motley, Esq.  
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Intl. Number : 1 (704) 765 - 4887  
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